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March 1, 2017

Regional Freedom of Information Officer
U.S. EPA, Region 5
77 West Jackson Boulevard (MI-9J)
Chicago IL 60604-3590

Re: FOIA Request for Pollutants in Beach City

Dear Regional Freedom of Information Officer:

I represent Dianne E. Moorehead, the mother and natural guardian of her minor son, Nicodemus G. Moorehead. According to my client and based upon recent news stories, the United States EPA ("EPA") has investigated the discharge of various wastewater pollutants into various streams, tributaries and reservoirs in and around central eastern Ohio, including without limitation, the Keiffer Tributary, the Beach City Reservoir, the Towpath Wetlands and the Ullet Tributary. These discharges occurred between April 1 – May 31, 2016.

According to my client, her son swam and played in the streams, tributaries and reservoirs at or near the sites where the wastewater containing surfactants was discharged. Dr. Jennifer Gigas, her son's pediatrician and treating physician has preliminary indicated that Nicodemus current medical condition and illness evidences symptoms related to wastewater and surfactant exposure. It is important for Dr. Gigas to know what specific chemicals and pollutants were discharged into these streams, tributaries and reservoirs in order to evaluate Nicodemus' current symptoms.

My client is aware of a pending criminal action in the Northern District of Ohio known as *United States of America v. Boylan*, Case No. 17- CR – 0050. This Freedom of Information Act ("FOIA") request does not seek the production of investigative materials that are the subject of the pending criminal proceeding in the Northern District of Ohio. Instead, my client seeks only the scientific information, including any tests, reports and other materials, that identify the chemicals and pollutants that were found in samples taken at these locations between April 1 – May 31, 2016.

Under the circumstances, my client requests expedited processing of this FOIA request.

Below is my client's authorization permitting me and my firm to request this information on her behalf under the FOIA.

Very truly yours,



Stephen M. Bales

SMB/dmm

cc: Dianne E. Moorehead

PLEASE PROVIDE THE REQUESTED DATA AND INFORMATION TO MY ATTORNEYS, ZIEGLER METZGER, LLP.

See Attached

Date

See Attached

Dianne E. Moorehead, Parent and Natural Guardian of
Nicodemus G. Moorehead

Under the circumstances, my client requests expedited processing of this FOIA request.

Below is my client's authorization permitting me and my firm to request this information on her behalf under the FOIA.

Very truly yours,



Stephen M. Bales

SMB/dmm:

cc: Dianne E. Moorehead

PLEASE PROVIDE THE REQUESTED DATA AND INFORMATION TO MY ATTORNEYS, ZIEGLER METZGER, LLP.

February 24, 2017
Date

Dianne E. Moorehead
Dianne E. Moorehead, Parent and Natural Guardian of
Nicodemus G. Moorehead